

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**MARK F. GUIMOND and KALLIE A.
GUIMOND, on behalf of themselves and
others similarly situated,**

Plaintiffs,

v.

**TOYOTA MOTOR CREDIT
CORPORATION,**

Defendant.

C.A. No. 3:12-cv-00606-JAG

**CONSENT MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' COMPLAINT**

Pursuant to FED. R. CIV. P. 6(b)(1), defendant Toyota Motor Credit Corporation ("TMCC") respectfully requests an extension of time until Monday, October 29, 2012 to respond to the complaint ("Complaint") filed by plaintiffs Mark F. Guimond and Kallie A. Guimond (collectively, "Plaintiffs"), on the following grounds:

1. Plaintiffs filed their Complaint on August 21, 2012, and the Complaint was served on TMCC on September 6, 2012. Presently, TMCC's deadline to respond to the Complaint is September 27, 2012. An extension of thirty (30) days, to Monday October 29, 2012, will not materially delay the disposition of this action.

2. TMCC respectfully requests an extension of time to investigate Plaintiffs' allegations and the applicable law in order to adequately respond to the Complaint.

3. Counsel for Plaintiffs has consented to TMCC's request for an extension of time until Monday October 26, 2012 to respond to the Complaint.

4. Extending the deadline to respond to the Complaint under the circumstances promotes the interest of judicial economy, fairness, and will help effectuate a just, speedy and inexpensive determination of this action. *See* FED. R. CIV. PROC. 1.

WHEREFORE, the parties respectfully request that the Court grant TMCC's Consent Motion for an Extension of Time to Respond to Plaintiffs' Complaint and permit TMCC to file its response to the Complaint on or before Monday, October 29, 2012. A copy of the proposed Consent Order, executed by counsel for the parties, is attached hereto as Exhibit A.

Respectfully submitted:

/s/
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*Counsel for Defendant
Toyota Motor Credit Corporation*

Dated: September 19, 2012

CERTIFICATE OF SERVICE

I certify that on September 19, 2012, I electronically filed a true and correct copy of the foregoing Consent Motion and proposed Consent Order with the Court using the CM/ECF system, which will cause the following CM/ECF participants to be served with the foregoing documents:

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